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December 17, 2019

Via ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: Nora North v. ARS National, Services, Inc.
Case No. 1:19-cv-10614-JGK

Dear Judge Koeltl:

I represent Defendant, ARS National Services, Inc. (“Defendant”), in the above matter. I am submitting this Motion to respectfully request an extension of time to January 6, 2020 for Defendant to answer or otherwise plead to the Complaint. (Doc. 1).

Defendant’s deadline to answer or otherwise plead to the Complaint was December 16, 2019. (Doc. 5). Defendant retained me to represent Defendant in this matter over this past weekend. On Monday, December 16, 2019, my office contacted counsel for Plaintiff, Brian Bromberg, Esq., to seek consent for an extension of the December 16, 2019 deadline. Counsel for Plaintiff had no objection to the request. I was not able to submit this request to Your Honor yesterday because I was transitioning employment to a new law firm, and yesterday was my first day. This is Defendant’s first request for an extension of the deadline to answer or otherwise plead to the complaint. This request does not impact any other present deadlines.

Wherefore, Defendant respectfully requests that Your Honor extend the deadline for Defendant to answer or otherwise plead to the Complaint to January 6, 2020.

Respectfully,

/s/Richard J. Perr
Richard J. Perr, Esq.

cc: Brian Bromberg, Esq. (via ECF)